

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

CENTRALSQUARE TECHNOLOGIES,  
LLC,

Plaintiff,

v.

CARBYNE INC., and  
CARBYNE, LTD.

Defendants.

Civil Action No. 1:24-cv-01497

JURY TRIAL DEMANDED

**JOINT MOTION TO EXTEND TIME TO FILE  
CASE READINESS STATUS REPORT**

Plaintiff CentralSquare Technologies, LLC (“CentralSquare”) and Defendants Carbyne Inc., and Carbyne, Ltd. (“Carbyne”) submit this joint motion to extend the time for the parties to submit a Case Readiness Status Report (“CRSR”).

Defendants Carbyne responded to CentralSquare’s Complaint on May 12, 2025, filing therewith offensive patent counterclaims against CentralSquare. (Dkt. No. 11). CentralSquare’s deadline to respond to Carbyne’s counterclaims is June 2, 2025. The Court’s Standing Order Governing Proceedings (OGP) 4.4—Patent Cases provides that the CRSR is due within 7 days after “the Defendant...has responded to the initial pleadings....” OGP 4.4, however, does not expressly contemplate the effect of offensive patent counterclaims on this deadline. Treating Carbyne’s answer date of May 12, 2025 as triggering the 7-day CRSR deadline would result in Carbyne’s preliminary infringement contentions being due on May 26, 2025, before CentralSquare

answers Carbyne's patent infringement claims on June 2, 2025, closing the pleadings as to those patent claims.

In light of this, Carbyne approached CentralSquare to propose that the parties treat CentralSquare's deadline to respond to Carbyne's counterclaims, June 2, 2025, as the date on which "the Defendant...has responded to the initial pleadings..." making the CRSR due on June 9, 2025, with all subsequent deadlines to be keyed off this date.

The parties have met and conferred, and hereby jointly ask the Court to set the deadline for the CRSR to June 9, 2025, with all subsequent deadlines to follow pursuant to provisions of OGP 4.4. One prior extension of time has been requested and granted, which, following waiver of service by both Carbyne defendants, extended the deadline of the domestic Carbyne defendant to correspond to the deadline of the international Carbyne defendant. (Dkt. No. 10). The instant requested extension will result in minimal delay, and will avoid preparation and service of infringement contentions on claims for which the pleadings are not yet complete.

Accordingly, the Parties request that the Court issue the attached proposed order extending the parties' time to file a CRSR to June 9, 2025.

Dated: May 16, 2025

/s/ Lionel M. Lavenue\_\_\_\_\_

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***Attorney for Defendants***  
***CARBYNE INC., AND CARBYNE, LTD.***

**CERTIFICATE OF CONFERENCE**

Plaintiff states that (1) counsel complied with the meet and confer requirements of Local Rule CV-7, and (2) that counsel for the Defendant stated that they do not oppose the extension of time as outlined in this motion.

/s/ Mark D. Siegmund  
Mark D. Siegmund

**CERTIFICATE OF SERVICE**

I hereby certify that on May 16, 2025, a true and correct copy of the foregoing has been served on all counsel of record via the court's CM/ECF system in accordance with the Federal Rules of Civil Procedure.

/s/ Mark D. Siegmund  
Mark D. Siegmund